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BY EMAIL

June 22, 2016

Honorable Shelley C. Chapman
United States Bankruptcy Judge
United States Bankruptcy Court
One Bowling Green
New York, New York 10004

Re: In re Lehman Brothers Holdings Inc., Chapter 11 Case No. 08-13555 (SCC) (jointly administered)

Dear Judge Chapman:

Reference is made to the *Notice of Hearing on Amended Motion for Relief from the Automatic Stay* (ECF No. 52984), filed by Ironbridge Homes, LLC, Ironbridge Mountain Cottages, LLC, Ironbridge Aspen Collection, LLC, Ironbridge Management LLC, Dirk Gosda, Hansen Construction, Inc., and Steven A. Hansen (collectively, the “Movants”), seeking to schedule their motion for relief from the automatic stay, dated December 19, 2011 (ECF No. 23551) (the “Stay Relief Motion”), for a hearing on July 12, 2016 (the “Proposed Hearing”).

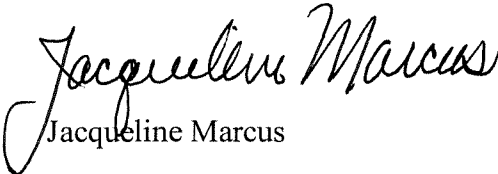
As the Court is aware, during the hearing held on May 10, 2016 (the “May Hearing”), the Court suggested that LB Rose Ranch, LLC (“LB Rose Ranch”) and the Movants participate in mediation with a sitting Judge of the United States Bankruptcy Court of the Southern District of New York. The parties are moving forward with the Court’s recommendation and are currently in the process of selecting mutually agreeable dates to propose to the Court’s designated mediator. Also, as discussed at the May Hearing, on May 19, 2016, LB Rose Ranch served a notice on counsel for the Movants terminating the Tolling and Forbearance Agreement. As of the date hereof, LB Rose Ranch has also filed a notice of dismissal in the action commenced in the Ninth Judicial District Court of Garfield County, Glenwood Springs, Colorado, assigned case number 2011CV310 (the “Garfield County Action”), with respect to Movants Ironbridge Homes, LLC, Ironbridge Mountain Cottages, LLC, and Ironbridge Aspen Collection, LLC, each of which filed proofs of claim against LB Rose Ranch in the above referenced chapter 11 cases. LB Rose Ranch has not served the complaint against the remaining defendants. Pursuant to paragraph 4 of the Tolling and Forbearance Agreement, LB Rose Ranch agreed to abate all deadlines in the Garfield County Action (unless the District Court refuses to permit such deadlines to be

abated) until a date that is at least 30 calendar days after the date on which this Court enters a final order disposing of the Stay Relief Motion.

LB Rose Ranch has requested that the Movants adjourn the Proposed Hearing in light of the anticipated mediation and the status conference scheduled in the *Jamin Cook et al. v. Ironbridge Homes, LLC et al.* (Case No. 2010CV142) (the “Homeowners Litigation”) to take place on July 8th (which is after the proposed deadline for LB Rose Ranch to respond to the Stay Relief Motion). LB Rose Ranch also requested that the Proposed Hearing be used as a status conference to report to the Court the outcome of the conference in the Homeowners Litigation. LB Rose Ranch believes that proceeding in this manner will provide the parties with the necessary information to determine how to proceed and, if necessary, schedule a hearing and a response deadline with respect to the Stay Relief Motion.

The Movants have denied LB Rose Ranch’s request for an adjournment. Inasmuch as the adjournment does not prejudice any of the Movants and is fair and reasonable, LB Rose Ranch is respectfully requesting that the Court adjourn the Stay Relief Motion to a date to be determined after a status conference on July 12, 2016. LB Rose Ranch is available for a telephonic conference to discuss the requested adjournment at the Court’s convenience.

Respectfully submitted,


Jacqueline Marcus

cc: Tracy Klestadt, Esq. (by email)
Duncan Barber, Esq. (by email)